



**KANE, PUGH, KNOELL, TROY & KRAMER LLP**

**BY: JUSTIN A. BAYER, ESQUIRE**

ATTORNEY I.D. NO. 032722004

510 SWEDE STREET

NORRISTOWN, PA19401

Phone: (610) 275-2000

Fax: (610) 275-2018

ATTORNEY FOR DEFENDANT

*Greyhound Lines, Inc.*

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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEW JERSEY**

GARY BOLYER and DENISE JONES,

Plaintiffs,

v.

GREYHOUND LINES, INC.,

Defendant.

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CIVIL ACTION No.

**PETITION IN SUPPORT OF**  
**NOTICE OF REMOVAL**

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Pursuant to 28 U.S.C. § 1441(a), Defendant, Greyhound Lines, Inc., by and through its Counsel, Kane, Pugh, Knoell, Troy & Kramer, LLP, and Justin A. Bayer, Esquire, hereby submits this Petition in Support of Notice of Removal from the Superior Court of the State of New Jersey, Law Division–Essex County, to the United States District Court for the District of New Jersey. Defendant appears specially so as to reserve any and all rights of defenses under Federal Rule of Civil Procedure 12 or otherwise, including but not limited to the defenses of lack of personal jurisdiction, failure to state a claim upon which relief can be granted, and improper service of process. In support of its Notice of Removal, Defendant states as follows:

1. Plaintiffs commenced this action by way of Complaint filed in the Superior Court for the State of New Jersey, Law Division–Essex County, on or about October 15, 2020, as *Gary Bolyer and Denise Jones v. Greyhound Lines, Inc.*, Docket No. ESX-L-6931-20. See Complaint and Jury Demand, attached as Exhibit “A.”

2. Essex County, New Jersey, is embraced by this United States District.

3. Defendant's Notice of Removal has been filed in this United States District Court within the time provided by law for the removal of civil to the United States District Courts.

4. This Court has original jurisdiction over this action, under 28 U.S.C. § 1332(a), because it is a civil action between citizens of different states and, upon information and belief, the amount in controversy exceeds the sum or value of \$75,000.00, exclusive of interests or costs.

5. Upon information and belief, and as alleged in the Complaint, Plaintiffs, Gary Bolyer and Denise Jones, are domiciliaries and, therefore, citizens of the State of Louisiana.

6. Defendant, Greyhound Lines, Inc., is a corporation, incorporated in the State of Delaware with a principle place of business in the State of Texas.

7. Thus, there is complete diversity of citizenship between Plaintiffs and Defendant.

8. Plaintiffs allege they sustained injuries and damages while passengers on Defendant's motor vehicle.

9. Plaintiffs also allege damages in an unspecified amount, but which, upon information and belief, exceeds the sum of \$75,000, exclusive of interests or costs.

10. Defendant has not pleaded or otherwise appeared in this action.

11. By reason of the foregoing, a removal of the action to this Court is proper, under 28 U.S.C. §§ 1332(a), 1441(a).

12. Defendant is providing written notice of this removal to Plaintiffs and will file a copy of this Notice of Removal with the Clerk of Court of the Superior Court of the State of New Jersey, Essex County, thereby effecting the removal of this action to this Court.

13. Removal is hereby effective, without waiver of any challenges Defendant may have under Federal Rule of Civil Procedure 12 or otherwise.

**KANE, PUGH, KNOELL, TROY & KRAMER, LLP**

A handwritten signature in blue ink, appearing to read "J G B", is written below the firm name.

BY: \_\_\_\_\_  
JUSTIN A. BAYER, ESQUIRE  
ATTORNEY FOR DEFENDANT  
*Greyhound Lines, Inc.*

DATE: October 23, 2020

**KANE, PUGH, KNOELL, TROY & KRAMER LLP**  
**BY: JUSTIN A. BAYER, ESQUIRE**  
ATTORNEY I.D. NO. 032722004

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CIVIL ACTION No.

**CERTIFICATION OF FILING**

**NOTICE OF REMOVAL**

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I, Justin A. Bayer, Esquire, of the law firm Kane, Pugh, Knoell, Troy & Kramer, LLP, Counsel for Defendant, Greyhound Lines, Inc., certify that a certified copy of Defendants' Notice of Removal will be filed with the Clerk of the Superior Court of the State of New Jersey, Essex County, wherein the state court action which is the subject the instant removal is pending.

BY: \_\_\_\_\_

  
JUSTIN A. BAYER, ESQUIRE  
ATTORNEY FOR DEFENDANT  
*Greyhound Lines, Inc.*

DATE: October 23, 2020

**KANE, PUGH, KNOELL, TROY & KRAMER LLP**

**BY: JUSTIN A. BAYER, ESQUIRE**

**ATTORNEY I.D. NO. 032722004**

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ATTORNEY FOR DEFENDANT

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CIVIL ACTION No.

**CERTIFICATION OF SERVICE**

**NOTICE OF REMOVAL**

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I, Justin A. Bayer, Esquire, of the law firm Kane, Pugh, Knoell, Troy & Kramer, LLP, Counsel for Defendant, Greyhound Lines, Inc., certify that I served a true and correct copy of the Notice of Removal, Petition in Support of Notice of Removal, Certifications, and Disclosure Statements in the above-captioned matter on all counsel of record on October 23, 2020, via the Court's e-filing system, e-mail, and/or U.S. First Class Mail, postage prepaid, as follows:

Mark Anythony Bailey, Esq.  
569 Dr. MLK Boulevard  
Newark, NJ 08861  
Fax: (866) 259-6440

BY: 

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JUSTIN A. BAYER, ESQUIRE  
ATTORNEY FOR DEFENDANT  
*Greyhound Lines, Inc.*

DATE: October 23, 2020